

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

10 JUN -9 AM 11:53

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVOR J. SHEA

Defendant.

Cause No. 1:10-CR-

**1 : 10-cr-0096 WTL -KPF**

**INDICTMENT**

INTRODUCTION

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The term "minor" was defined as set forth in Title 18, United States Code, Section 2256(1), as any person under the age of eighteen years.

2. The term "sexually explicit conduct" was defined as set forth in Title 18, United States Code, Section 2256(2), as including actual or simulated: sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal; masturbation; lascivious exhibition of the genitals or pubic area of any person; and sadistic or masochistic abuse.

3. The term "visual depiction" was defined as set forth in Title 18, United States Code, Section 2256(5), as including data stored on a computer disk or by electronic means which is capable of conversion into a visual image.

4. As used in this Indictment, the name "JANE DOE 1" is the pseudonym of a minor female born in 1993.

The Grand Jury charges that:

**Counts 1- 4**

**(Sexual Exploitation of Children/Production of Sexually Explicit Images of a Minor)**

5. On or about September 20, 2009, within the Southern District of Indiana and elsewhere, the defendant, TREVOR J. SHEA, did employ, use, persuade, induce, entice, and coerce a minor, to wit: JANE DOE 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and such visual depiction(s) was actually transported and transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, to wit, the following digital files:

<b>Count</b>	<b>Digital File Name</b>
1	blahhh.jpg
2	DSCN4067.jpg
3	2.avi
4	3.avi

Each count of which is a separate violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**FORFEITURE**  
**18 U.S.C. § 2253**

The allegations in Counts 1<sup>4</sup> of this Indictment are re-alleged as if fully set forth here, for the purpose of giving the defendant notice that the United States intends to pursue forfeiture of property pursuant to Title 18, United States Code, Section 2253 as part of any sentence imposed herein.

If convicted of the offense set forth in Count 1<sup>4</sup>, the defendant, Trevor J. Shea, shall forfeit to the United States the defendant's interest in: 1) any visual depictions described in Title 18, United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depictions, which were produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; 2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from offense(s) of which the defendant is convicted; and 3) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense of which the defendant is convicted, or any property traceable to such property.

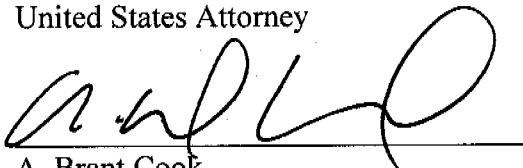
A TRUE BILL:



FOREPERSON

TIMOTHY M. MORRISON  
United States Attorney

by:

  
A. Brant Cook  
Assistant United States Attorney